Remarks

Claims 1-19 are pending in this application. In view of this Amendment reexamination and reconsideration are respectfully requested.

Examiner rejected claims 1-19 under 35 U.S.C. § 103 as being unpatentable over Stefanopoulos et al and in view of Schmandt et al. Applicant traverses the examiner's interpretation of the prior art and the finding of obviousness.

Stefanopoulos et al is concerned with a hypermedia computer-aided expert system, while Schmandt discusses a speech interface for windows based systems. Neither of these references individually or in combination teaches or suggests the Applicant's invention. The Examiner finds basis for a network system from a single statement in Schmandt and an argument which is without basis in the cited art. The Examiner's argument is as follows: first, Schmandt is found to deal with networked workstations. A definition of "server" is then offered which includes the word "workstations." The combination of these two is then to suggest that Schmandt teaches the use of speech in a network environment. The Examiner then concludes that this combination obviates Applicant's invention. The Examiner's argument has several problems outlined hereinbelow.

First, Schmandt does not teach or suggest the use of speech in a network environment. The quoted statement has been distorted out of context. The full statement is as follows:

> **Window Systems**. Windows are now commonplace on bitmapped computer workstations. Window systems allow the screen to be divided into a number of regions, with each allocated to input or output from a particular computer process or program. Because windows are so ubiquitous and are indeed the substrate on which so much workstation use is based, we felt that no research into speech and user interfaces should ignore them. We chose to work with the X Window System because it is a de facto standard across workstations.

This paragraph is emphasizing the reason for choosing a particular windows environment. Because of the widespread use of X-Windows, the authors chose this

environment for research and implementation of their idea. The statement merely means that the X-Windows environment is used in many systems. Therefore, the statement "across workstations" simply means in the installed base of workstations there are many which have the X-Windows operating system. This paragraph in no way suggests a network application of the speech system described in the article, particularly one as claimed by Applicant herein.

Second, the Examiner uses the plural word "workstations" to find in a dictionary a definition of the term server also uses the term "workstations" to infer that Schmandt suggests Applicant's invention. But as discussed above, the term was not used in the sense of work stations that are interconnected, but only multiple workstations. Therefore to infer a server is necessarily involved is clearly without basis in fact.

Further, even if Schmandt does some how suggest to use its software in a networked environment, it does not teach or suggest the Applicant's invention. The Applicant herein claims an information resource which is not a typical local data base such as Stefanopoulos's expert system. In contrast, the Applicant claims a system for accessing remote data across a network such as the internet. In addition, Applicant claims a grammar located in the remote data, or HTML page, which is then accessed by a network browser. The cited art does not teach or suggest this element.

Further, the cited art does not teach suggest the type of browser which is described in the specification and claimed by the Applicant. The Examiner has used the user interface associated with the expert system to find the browser element of the Applicant's claim. The cited art does not teach or suggest a browser as the term is defined in the application and used by the Applicant in the claims.

The Examiner has not shown motivation to combine the references and then make the further enhancements to the combination to achieve Applicant's invention. Motivation seems particularly lacking where the cited art is not concerned with the same area of the art or the problems solved by Applicant's invention. Applicant's invention is concerned

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with improving the ease of using a complex database such as the internet. It allows the user to easily make voice grammars for accessing the World Wide Web, and to create speakable hyperlinks to pages accessed on the web. The cited art in combination does not teach or suggest to one in the art ways to accomplish these ends, thus how the examiner finds the cited art makes the Applicant's invention obvious without using the applicant's invention to piece together the prior art and fill in the missing pieces is not clearly shown. The combination of the cited references would not suggest on one in the art anything even similar to Applicant's inventions without using the Applicant's application as a guidebook.

Applicant respectfully requests the Examiner to reconsider this case in light of the above arguments and pass the case to issuance or find art which backs the Examiner's arguments.

Respectfully submitted,

Bret J. Petersen
Attorney for Applicant(s)
Reg. No. 37,417

Texas Instruments Incorporated
P. O. Box 655474, M/S 219
Dallas, Texas 75265
(972) 995-5492